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Via ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1930
New York, New York 10007-1312

April 7, 2021

Re: *King v. Wang et. al.* Nos. 14-cv-07694 (LJL-JLC)

Judge Liman:

I am counsel to Defendants Andrew and Shou-Kung Wang and write to request a brief extension of the parties' time to respond to motions *in limine*, from April 12, 2021 to April 19, 2021, without any other modification to the current schedule. As your Honor is aware, the Court initially scheduled motions *in limine* to be filed on March 15, 2021, with oppositions due April 12, 2021 and replies (along with the joint pre-trial order) due April 26, 2021, and the trial scheduled to begin June 21, 2021. Docket No. 230. On March 2, 2021, at the request of the parties, the Court adjusted the deadline for filing motions *in limine* to April 9, 2021, without adjusting any of the other deadlines. Docket No. 236.

As that extension truncated the time for opposition papers to 3 days, while leaving the parties 2 weeks for reply papers, and on the assumption that the April 26 date is a hard deadline given the scheduled trial date, we respectfully request that the Court adjourn the deadline for opposition papers to April 19, 2021, which would leave the parties 10 days for opposition papers and a week for reply briefs. In the alternative, to the extent that the Court is comfortable adjourning the April 26 date for replies and the pre-trial order without a corresponding adjustment to the trial date, we ask that the Court do so and set whatever new deadlines for oppositions, replies, and the pre-trial order the Court believes appropriate. (Any adjournment of the trial date would be problematic, because Defendants' counsel has another trial currently scheduled for July 2021 and a family vacation scheduled for August 2021, neither of which can be moved, and which would thus require any adjournment of trial in this action to extend into and beyond September 2021, which would negatively impact the availability of the parties and their witnesses for trial.)

We are informed that Plaintiff does not consent to this request and will instead ask the Court to adjourn oppositions to April 23, 2021 (four days after our proposed opposition date) and the joint pre-trial order (and presumably replies on the motions *in limine*) to May 10, 2021. As noted above, Defendants do not oppose any such longer extension unless it

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would also require an adjournment of the trial date, but do oppose any extension that would require adjourning the trial.

Respectfully Submitted,

By: /s/ Akiva M. Cohen

Akiva M. Cohen

cc. All counsel of record [*via* ECF]